

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: JOHN RANDALL FOLKES
Debtor

CHAPTER 12
CASE NO. 20-50172-KMS

FIRST APPLICATION FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF NECESSARY EXPENSES
FOR THE LAW OFFICES OF CRAIG M. GENO, PLLC

COMES NOW the Law Offices of Craig M. Geno, PLLC (the “Applicant”), and files this its *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the “Application”), and in support thereof would show unto the Court the following, to-wit:

1. On January 30, 2020, the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 12 of the Bankruptcy Code.
2. On March 2, 2020, an Order [DK #20] approving the employment of the Applicant, as attorneys for the Debtor was entered by the Court.
3. The substantial services rendered to the Debtor and the expenses incurred by Applicant benefitted the estate. An Affidavit reflecting said legal services rendered and expenses incurred is attached hereto as Exhibit “A”. The Affidavit also certifies and represents to the Court that the services rendered to the Debtor were reasonable and necessary and that said services have actually been rendered. A detailed itemization of such services and expenses is attached as Exhibit “B” and incorporated by reference.
4. The fees and expenses charged and incurred represent reasonable and necessary fees and expenses that were required to be extended by Applicant to the Debtor in all matters which are anticipated to arise in the functioning of litigation matters, case administration and to protect and preserve all rights of the Debtor and the interests of creditors in furtherance of the counsel’s

obligations herein; and they represent normal and customary fees and expenses incurred and charged for representation of debtors in similar cases. The time, skill and experience utilized by counsel for the Debtor justify the approval of the Application.

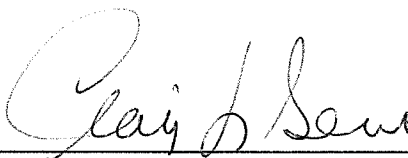
5. This is the Applicant's first request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from October 27, 2019, to and including August 9, 2021, and is for the sum of \$36,587.93 (\$35,229.50 in fees and \$1,358.43 in expenses), less any retainer balance remaining.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing the Debtor to pay said attorneys' fees and expenses. Applicant prays for general relief.

THIS, the 9th day of August, 2021.

Respectfully submitted,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com

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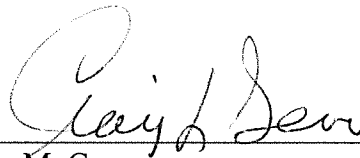
CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to the following:

Harold J. Barkley, Jr., Esq.
hjb@hbarkley13.com

Christopher J. Steiskal, Esq.
christopher.j.steiskal@usdoj.gov

THIS the 9th day of August, 2021.



Craig M. Geno

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOHN RANDALL FOLKES
Debtor**

**CHAPTER 12
CASE NO. 20-50172-KMS**

EXHIBIT “A”

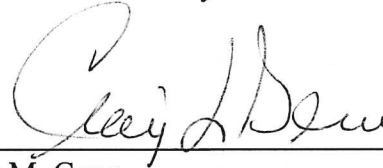
**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

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AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno, one of the attorneys for the Debtor, who after having been first by me duly sworn, stated on oath that this Affidavit is submitted in support of the *First Application for Allowance of Compensation and Reimbursement of Necessary Expenses for the Law Offices of Craig M. Geno, PLLC* (the "Application"), Debtor's counsel, that the statements which are attached to the Application as Exhibit "B" represent a detailed statement of reasonable fees and expenses. Affiant hereby makes application for payment of reasonable attorney's fees and necessary expenses.



Craig M. Geno

STATE OF MISSISSIPPI
COUNTY OF Madison

SWORN TO AND SUBSCRIBED BEFORE ME, this the 9th day of August, 2021.





NOTARY PUBLIC

MY COMMISSION EXPIRES June 21, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JOHN RANDALL FOLKES
Debtor**

**CHAPTER 12
CASE NO. 20-50172-KMS**

EXHIBIT “B”

Law Offices of Craig M. Geno, PLLC

587 Highland Colony Parkway
 Ridgeland, MS-Mississippi 39157 USA

Ph:601-427-0048

Fax:601-427-0050

John Folkes
 144 Homer Rolks Rd.
 Seminary, MS-Mississippi
 39479 USA

August 9, 2021

Attention:

File #: 320005

Inv #: 347584

RE: Chapter 12

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-27-19	Conference with Mr. Folkes re Chapter 12 filing	1.10	412.50	CMG
Jan-30-20	Conference with client regarding Chapter 12; review and revision of Chapter 12 initial papers	0.35	131.25	CMG
	Meeting with John Folkes re filing; Assist CMG drafting Petition, New Client Data Sheet, Statement of SSN, Matrix, Schedules D, E/F, and setting up file	1.50	277.50	KLC
Jan-31-20	Receipt and review of Deficiency Notice; calendar deadline to file Schedules, Attorney Disclosure Statement, SOFA	0.10	18.50	KLC
	Receipt and review of Deficiency Notice; calendar deadline to file Plan and reminders	0.10	18.50	KLC
	Assist CMG drafting Attorney Disclosure Statement, Application to Employ, Notice, Certificate of Service and Order re same	0.20	37.00	KLC
Feb-01-20	Review deficiency notice regarding Plan	0.10	37.50	CMG
	Review Notice regarding schedules	0.10	37.50	CMG
Feb-03-20	Dictation of 2016(b) Statement	0.10	37.50	CMG

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	Dictation of Application to Employ, Notice and Certificate of Service; review and revision of same	0.55	206.25	CMG
	Organize and supervise mailout of Application to Employ CMG	0.40	74.00	KLC
Feb-04-20	Review supplier notice	0.20	75.00	CMG
Feb-13-20	Dictation of Motion/Order regarding schedules; review and revision of same	0.45	168.75	CMG
	Assist CMG in drafting and revising Motion for Extension of Time Within Which to File Required Documents; assist CMG in drafting Order re same; ECF filing re Motion and Order	0.40	74.00	SLP
Feb-18-20	Receipt and review of Order re Motion to Extend Time to File Required Documents; calendar deadline to file SOFA, Schedules	0.10	18.50	KLC
Feb-21-20	Review Proof of Claim from Citizens Bank	0.25	93.75	CMG
	Review Peoples Bank Notice	0.20	75.00	CMG
Feb-28-20	Review AMEX Proof of Claim	0.30	112.50	CMG
Mar-02-20	Review memos to/from client regarding schedules	0.15	56.25	CMG
	Review and revision of schedules and SOFA	1.15	431.25	CMG
	Meeting with John Folkes re Schedules, SOFA	1.00	185.00	KLC
	Assist CMG drafting Schedules, SOFA	0.50	92.50	KLC
Mar-03-20	Conference with Katie Carter regarding salvage entity, survey on claims, final review and revision of Schedules, SOFA	0.35	131.25	CMG
Mar-04-20	Review Notice of Deficiency	0.10	37.50	CMG
	Receipt and review of Notice of Deficiency; calendar deadline to file Amended Matrix	0.10	18.50	KLC
Mar-05-20	Assist CMG drafting Amended Matrix	0.20	37.00	KLC

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Mar-07-20	Review Ford Notice	0.10	37.50	CMG
Mar-20-20	Update/preparation of document management control (subfiles and pleadings)	0.80	148.00	SLP
Mar-26-20	Receipt and review of Notice of Meeting of Creditors; calendar various deadlines	0.15	27.75	KLC
Apr-02-20	Review Chapter 12 Trustee form requests	0.20	75.00	CMG
	Review Notice of 341; deadlines	0.20	75.00	CMG
	Dictation of letter to client regarding 341, deadlines, form info to Chapter 12 Trustee	0.20	75.00	CMG
	Receipt and review of Letter from Ch. 12 Trustee Requesting Documents; calendar deadline to submit documents	0.10	18.50	KLC
	Assist CMG drafting letter to John Folkes re MOC and letter from Trustee requesting documents	0.10	18.50	KLC
Apr-04-20	Review Ashley Funding Proofs of Claim (2)	0.35	131.25	CMG
Apr-10-20	Review Peoples Bank Proofs of Claim	0.65	243.75	CMG
Apr-11-20	Review memo from Mr. Folkes regarding documents to produce	0.20	75.00	CMG
Apr-19-20	Update/preparation of document management control (subfiles and pleadings)	0.10	18.50	SLP
Apr-21-20	Review memos to/from CPA and Katie Carter regarding tax returns	0.20	75.00	CMG
Apr-24-20	Receipt and review of Agreed Order Resetting Meeting of Creditors; calendar meeting of creditors date to trigger preparation of hearing folder	0.10	18.50	KLC
Apr-27-20	Review Order on 341	0.20	75.00	CMG
	Dictation of letter to client regarding Order on 341	0.20	75.00	CMG
	Assist CMG drafting letter to John Folkes re Rescheduled MOC	0.10	18.50	KLC

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May-05-20	Telephone conferences (2) with Mr. Folkes regarding 341	0.10	37.50	CMG
	Attended 341	0.55	206.25	CMG
May-07-20	Review 341 minutes	0.10	37.50	CMG
	Assist CMG drafting Application to Employ Accountant Crosby, Notice, Certificate of Service and Order re same	0.30	55.50	KLC
May-24-20	Dictation of Application to Employ Accountant	0.35	131.25	CMG
	Dictation of Notice regarding Application to Employ Accountant	0.20	75.00	CMG
	Dictation of Certificate of Service regarding Application to Employ Accountant	0.15	56.25	CMG
	Review and revision of Application to Employ Accountant papers	0.20	75.00	CMG
	Dictation of motion for additional time to file Plan	0.40	150.00	CMG
	Dictation of Notice regarding Plan Motion	0.20	75.00	CMG
	Dictation of Certificate of Service regarding Notice regarding Plan Motion	0.15	56.25	CMG
May-26-20	Assist CMG drafting Motion for Additional Time to File Plan, Notice, Certificate of Service and Order re same	0.20	37.00	KLC
May-27-20	Dictation of letter to client regarding Monthly Operating Reports	0.20	75.00	CMG
	Assist CMG drafting letter to John Folkes re MORs	0.10	18.50	KLC
May-29-20	Review and revision of Plan filing papers	0.10	37.50	CMG
	Review and revision of Accountant Application papers	0.15	56.25	CMG
	Organize and supervise mailout of Motion for Additional Time to File Plan and Application to Employ Accountant Crosby	0.50	92.50	KLC

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Jun-08-20	Conference with W. Newman regarding appraisal	0.20	75.00	CMG
Jun-17-20	Review Certificate of Service and order extending A.S.	0.20	75.00	CMG
	Receipt and review of hearing notice re Peoples Bank's Motion to Lift Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
Jun-18-20	Review Order on Stay	0.10	37.50	CMG
Jun-19-20	Review Peoples MTLs	0.75	281.25	CMG
	Dictation of letter to client regarding Peoples MTLs, Monthly Operating Reports and Plan	0.20	75.00	CMG
	Review Peoples MTLs Hearing Notice	0.20	75.00	CMG
	Review Peoples Bank objection to motion for additional time to file Plan	0.35	131.25	CMG
	Receipt and review of hearing notice re Motion to Extend Time to File Plan; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Assist CMG in drafting letter to John Folkes re Monthly Operating Reports and Peoples Bank Motion to Lift Stay; draft email to John Folkes re same	0.20	37.00	SLP
Jun-23-20	Dictation of letter to CPA regarding Order of Employment	0.20	75.00	CMG
Jun-24-20	Assist CMG drafting letter to Freddy Crosby sending Employment Order	0.10	18.50	KLC
Jul-03-20	Review Trustee response	0.20	75.00	CMG
Jul-13-20	Review Notice regarding Telephonic Hearing	0.10	37.50	CMG
Jul-16-20	Review People's Motion to Lift and exhibits	0.85	318.75	CMG
	Dictation of Answer to People's Motion	0.75	281.25	CMG

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	Assist CMG drafting Answer, Response to Peoples Bank's Motion to Lift Stay	0.30	55.50	KLC
Jul-21-20	Review reset order on Bank MTLs	0.20	75.00	CMG
	Review Order setting hearing on time to file plan	0.20	75.00	CMG
	Receipt and review of Order Resetting Hearing re Peoples Bank's Motion for Relief; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Motion to Extend Time to File Plan; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Jul-22-20	Review memos to/from Katie Carter, Rebecca Dossett, review evidence of insurance, dictation of memo to Walter Newman regarding evidence of insurance	0.25	93.75	CMG
Jul-30-20	Update/preparation of document management control (subfiles and pleadings)	0.50	92.50	SLP
Aug-10-20	Review Notice regarding Telephonic Hearing	0.10	37.50	CMG
Aug-17-20	Review January - July 2020 Monthly Operating Reports	1.00	375.00	CMG
	Dictation of letter to Harold Barkley regarding Monthly Operating Reports	0.20	75.00	CMG
	Assist CMG in drafting letter to Harold Barkley re original executed pages of Chapter 12 Monthly Cash Receipts and Disbursement Reports for January 2020 to July 2020; ECF filings re same	0.30	55.50	SLP
Aug-19-20	Review file and court docket re: 8/20/20 hearing on Peoples Bank's Motion to Lift Stay; prepare hearing folder for same	0.25	46.25	KLC
Aug-20-20	Telephone conference with J. Jones regarding scheduling	0.10	37.50	CMG
	Telephone conference with Christy Cannette regarding issues for 1:30 hearing	0.10	37.50	CMG

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	Attended Status Conference	0.25	93.75	CMG
	Receipt and review of Order Resetting Hearing re Peoples Bank's Motion for Relief from Stay; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of minute entry re Peoples Bank's Motion for Relief from Stay & Plan; calendar rescheduled hearing date on confirmation to trigger preparation of hearing folder	0.10	18.50	KLC
Aug-21-20	Receipt and review of Minute Entry re Motion for Additional Time to File Plan; calendar deadline to submit proposed order	0.10	18.50	KLC
Aug-25-20	Assist CMG revising Order on Motion for Additional Time to File Plan	0.10	18.50	KLC
Sep-03-20	Assist CMG revising Order on Motion to Extend Time to File Plan	0.10	18.50	KLC
Sep-04-20	Receipt and review of Order on Motion to Extend Time to File Plan; calendar deadline and reminders to file Plan	0.10	18.50	KLC
Sep-15-20	Assist CMG drafting Chapter 12 Plan	0.50	92.50	KLC
Sep-17-20	Review MORs.	0.35	131.25	CMG
	Dictate letter to Trustee regarding MORs.	0.25	93.75	CMG
Sep-18-20	Assist CMG revising Chapter 12 Plan	0.20	37.00	KLC
Sep-25-20	Telephone conference with Mr. Folkes regarding plan provisions.	0.75	281.25	CMG
	Review schedules and Statement of Affairs	0.75	281.25	CMG
	Second telephone conference with Mr. Folkes re Plan provisions	0.25	93.75	CMG
	Dictation of Plan of Reorganization	1.45	543.75	CMG
	Review and revise Plan of Reorganization	0.60	225.00	CMG

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	Assist CMG drafting and revising Chapter 12 Plan	1.10	203.50	KLC
Sep-29-20	Receipt and review of Notice & Order Setting Chapter 12 Confirmation Hearing; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
Oct-02-20	Dictation of Certificate of Service re Plan	0.15	56.25	CMG
	Assist CMG drafting Certificate of Service re Order & Notice re Plan, Plan	0.10	18.50	KLC
Oct-05-20	Organize and supervise mailout of Order and Notice re Plan, Plan	0.30	55.50	KLC
Oct-15-20	Review MOR	0.25	93.75	CMG
	Dictate letter to Chapter 12 Trustee regarding MOR.	0.20	75.00	CMG
Oct-20-20	Review memos to/from C. Meredith regarding appraisal.	0.20	75.00	CMG
Oct-21-20	Review memos from Chris Meredith regarding value of shop property.	0.20	75.00	CMG
	Review minute entry.	0.10	37.50	CMG
	Review Notice of status conference.	0.20	75.00	CMG
	Attended Status Conference.	0.25	93.75	CMG
	Receipt and review of Order Resetting Hearing re Chapter 12 Plan; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Peoples Bank's Motion for Relief from Stay; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Oct-22-20	Review Order of Reset	0.20	75.00	CMG
	Dictation of memo to client re trial strategy	0.20	75.00	CMG

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Oct-23-20	Conference with Katie Carter re trial strategy; Review insurance lapse notice	0.25	93.75	CMG
	Review numerous insurance certificates; Dictate memo to Walter Newman re insurance certificate	0.25	93.75	CMG
Oct-29-20	Dictation of Notice re land sale	0.25	93.75	CMG
	Dictation of Certificate of Service re land sale	0.20	75.00	CMG
	Dictation of Sale Motion	0.75	281.25	CMG
	Review and revise Sale Motion	0.15	56.25	CMG
	Assist CMG drafting and revising Motion to Sell House, Notice, Certificate of Service and Order re same	0.50	92.50	KLC
	Organize and supervise mailout of Motion to Sell House	0.20	37.00	KLC
Nov-02-20	Review Garner proof of claim	0.45	168.75	CMG
	Dictation of objection to Garner proof of claim; review and revise same	0.55	206.25	CMG
	Dictation of notice re claim objection	0.25	93.75	CMG
	Assist CMG drafting Objection to Lake Garner's Proof of Claim, Notice and Certificate of Service re same	0.20	37.00	KLC
	Organize and supervise mailout of Objection to Lake Garner's Proof of Claim and Notice re same	0.10	18.50	KLC
Nov-04-20	Review appraisal from Garner	1.10	412.50	CMG
	Review memos to/from Chris Meredith re settling Garner claim; appraisal stipulation	0.35	131.25	CMG
	Receipt and review of Order Resetting hearing re Ch. 12 Plan; calendar rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting hearing re Peoples Bank's Motion to Lift Stay;	0.10	18.50	KLC

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	calendar rescheduled hearing date to trigger preparation of hearing folder			
Nov-06-20	Review UST's objection to Debtor's Motion to Sell	0.20	75.00	CMG
	Review notice of hearing on Motion to Sell	0.20	75.00	CMG
	Receipt and review of hearing notice re Motion to Sell Home; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Nov-13-20	Review memos to/from Chris Meredith re claim objection/plan settlement	0.25	93.75	CMG
	Review Joinder	0.10	37.50	CMG
Nov-15-20	Telephone conference with Mr. Folkes re sale of assets and Garner settlement	0.25	93.75	CMG
Nov-25-20	Review memos to/from Mr. Folkes' office re monthly operating reports; offer on 41 acres and related matters	0.30	112.50	CMG
Dec-04-20	Review memo from client re sale contract	0.25	93.75	CMG
Dec-10-20	Review October MOR	0.30	112.50	CMG
	Dictation of letter to Trustee re October MOR	0.20	75.00	CMG
Dec-17-20	Assist CMG drafting Order on Objection to Proof of Claim of Lake Garner	0.10	18.50	KLC
Dec-29-20	Review land sale contract	0.75	281.25	CMG
	Dictation of sale motion	1.00	375.00	CMG
	Dictation of Notice re sale motion	0.25	93.75	CMG
	Dictation of Certificate of Service re sale motion	0.15	56.25	CMG
	Review and revision of sale motion	0.50	187.50	CMG
	Assist CMG drafting and revising Motion to Sell 41 Acres, Notice, Certificate of Service and Order re same	0.30	55.50	KLC

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	Organize and supervise mailout of Motion to Sell 41 Acres	0.40	74.00	KLC
Jan-01-21	Review November MOR	0.35	131.25	CMG
	Dictation of letter to Trustee re November MOR	0.20	75.00	CMG
Jan-04-21	Receipt and review of hearing notice re Motion to Sell 41 Acres; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Assist CMG drafting letter to Trustee sending original 1st pages of August - November 2020 MORs	0.10	18.50	KLC
Jan-05-21	Review Trustee's objection to sale	0.30	112.50	CMG
	Review hearing notice	0.20	75.00	CMG
	Dictation of Motion/Order to Continue	0.25	93.75	CMG
	Assist CMG drafting Motion to Continue Hearing on Motion to Sell and Order re same	0.25	46.25	KLC
Jan-06-21	Review memo from Chris Meredith re resolving POC objection	0.20	75.00	CMG
	Review action required memo from Clerk	0.20	75.00	CMG
	Dictation of Order on Claim Objection	0.30	112.50	CMG
	Review and revision of Order on Claim Objection	0.05	18.75	CMG
	Dictation of letter to Chris Meredith re Order on Claim Objection	0.15	56.25	CMG
	Review Garner withdrawal	0.20	75.00	CMG
	Receipt and review of Notice re Objection to Lake Garner's Proof of Claim No. 13; calendar deadline to submit proposed order	0.10	18.50	KLC
Jan-07-21	Review notice from staff	0.10	37.50	CMG
	Review reset order	0.20	75.00	CMG

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	Review notice of telephonic hearing	0.20	75.00	CMG
	Receipt and review of Order Resetting Hearing re Motion to Sell; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Assist CMG drafting Agreed Order on Objection to Lake Garner's POC #13	0.10	18.50	KLC
	Assist CMG drafting letter to Chris Meredith re Draft Agreed Order on Objection to Lake Garner's POC #13	0.10	18.50	KLC
Jan-09-21	Review memos to/from Walter Newman; Review draft order on Bank motion	0.75	281.25	CMG
Jan-13-21	Review memos to/from Justin Jones re settlement efforts and offers	0.25	93.75	CMG
Jan-15-21	Review memos to/from Justin Jones re new proposal	0.20	75.00	CMG
	Review memos to/from KLC, Scott Buffington re house sale details	0.25	93.75	CMG
Jan-18-21	Review reset minute entries and notices	0.25	93.75	CMG
Jan-19-21	Telephone conference with Mr. Folkes re continuance and proof on sale motion	0.20	75.00	CMG
	Conference with Walter Newman re continuance	0.20	75.00	CMG
Jan-25-21	Review notice re status conference	0.20	75.00	CMG
	Receipt and review of Notice of Telephonic Status Conference; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Jan-26-21	Conference with Walter Newman re house insurance	0.20	75.00	CMG
	Telephone conference with Client re house insurance lapse	0.20	75.00	CMG
	Review hearing notice	0.20	75.00	CMG
	Review revised MTLs order on Peoples Bank	0.25	93.75	CMG

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Jan-27-21	Conference with Walter Newman re revisions to Orders on Motions to Sell, Peoples Bank's Motion for Relief	0.20	37.00	KLC
Jan-28-21	Review file; Conference with Walter Newman re insurance	0.20	75.00	CMG
	Attended status conference	0.50	187.50	CMG
	Review minute entry	0.20	75.00	CMG
	Review reset orders	0.25	93.75	CMG
Jan-29-21	Dictation of sale order on 41 acres	0.85	318.75	CMG
	Review and revision of sale order on 41 acres	0.35	131.25	CMG
	Telephone conference with Client re 41 acres tax payment, new hearings and 2/4 proof	0.20	75.00	CMG
	Telephone conference with Walter Newman re taxes on 41 acres	0.10	37.50	CMG
	Review memo from KLC re order on 41 acres	0.10	37.50	CMG
	Receipt and review of Minute Entry re Motion to Sell 41 Acres; calendar deadline for CMG to submit proposed order	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Peoples Bank's Motion for Relief from Stay; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Motion to Sell House; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Chapter 12 Plan; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Assist CMG drafting and revising Agreed Order on Motion to Sell 41 Acres	0.20	37.00	KLC
Jan-31-21	Review orders resetting	0.20	75.00	CMG
Feb-01-21	Review memos to/from Justin Jones re Chapter 12 confirmation order	0.20	75.00	CMG

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	Review memos to/from Walter Newman, Justin Jones re changes to sale order	0.20	75.00	CMG
	Review and revision of sale order on 41 acres	0.25	93.75	CMG
	Review memos to/from Barbara Harrell; Review Trustee order resolving objections	0.20	75.00	CMG
	Review Agreed Order on Motion to Sell 41 Acres	0.10	18.50	KLC
	Assist CMG reviewing and revising itemizations	0.25	46.25	KLC
	Assist CMG preparing exhibits for 2/4/21 hearings	0.40	74.00	KLC
Feb-02-21	Review home photos	0.25	93.75	CMG
	Review December 2020 MOR	0.25	93.75	CMG
	Dictation of letter to Trustee re December 2020 MOR	0.20	75.00	CMG
	Conference with KLC re exhibits for trial	0.15	56.25	CMG
	Assist CMG drafting letter to Trustee sending original 1st page of December 2020 MOR	0.10	18.50	KLC
Feb-03-21	Dication of letter to Client re closing sale on 41 acres	0.25	93.75	CMG
	Review Helena exhibits; Review memo from Jim Spencer re Helena exhibits	0.25	93.75	CMG
	Legal research re interest rates; Review Stringer and Fortenberry cases, length of time secured claim can be restructured	1.00	375.00	CMG
	Review file and court docket re: 2/4/21 hearing on Motion to Sell House; prepare hearing folder for same	0.40	74.00	KLC
	Review file and court docket re: 2/4/21 hearing on Chapter 12 Plan; prepare hearing folder and exhibits for same	0.75	138.75	KLC
	Assist CMG drafting letter to John Folkes sending AO on Motion to Sell 41 acres	0.10	18.50	KLC

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	Assist CMG drafting and revising Agreed Order on Motion to Sell House	0.50	92.50	KLC
Feb-04-21	Telephone conference with Mr. Folkes re testimony	0.20	75.00	CMG
	Telephone conference with Walter Newman re proof at hearing	0.20	75.00	CMG
	Hearing prep; Attended confirmation hearing	2.85	1,068.75	CMG
	Review various minute and reset entries	0.15	56.25	CMG
	Review exhibit/witness lists	0.15	56.25	CMG
	Receipt and review of Order Resetting Hearing re Helena's Objection to Plan; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Minute Entry re Peoples Bank's Motion for Relief from Stay; calendar deadline to submit agreed order	0.10	18.50	KLC
	Receipt and review of Minute Entry re Motion to Sell House; calendar deadline to submit order	0.10	18.50	KLC
	Receipt and review of Minute Entry re Chapter 12 Plan; calendar deadline for Helena to file objection to orally amended plan and rescheduled hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Assist CMG revising Agreed Order on Motion to Sell House	0.10	18.50	KLC
Feb-05-21	Review and revision of order on home sale; Review memos to/from counsel re same	0.25	93.75	CMG
	Work on sale order, Bank MTLs order; Review memos to/from KLC re orders and tax obligations	0.35	131.25	CMG
	Assist CMG revising Agreed Order on Motion to Sell House	0.10	18.50	KLC
Feb-08-21	Review Helena objection to Plan	0.35	131.25	CMG
Feb-09-21	Review sale order; Draft memo to S. Buffington's office re closing from house sale	0.25	93.75	CMG

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Feb-11-21	Receipt and review of Agreed Order on Peoples Bank's Motion to Lift Stay; calendar deadline to close sales and disburse proceeds	0.10	18.50	KLC
	Assist CMG reviewing and revising itemizations	0.70	129.50	KLC
Feb-12-21	Dictate letter to client re sales of property, payment to Peoples Bank	0.20	75.00	CMG
	Assist CMG drafting letter to John Folkes sending AO on Motion to Sell House	0.10	18.50	KLC
Feb-18-21	Review memo from Teresa Conn; Review Seller's Closing Disclosures and settlement funds on house sale	0.20	75.00	CMG
	Review minute entry	0.20	75.00	CMG
	Telephone conference with C. Canette re continuance	0.20	75.00	CMG
	Telephone conference with W. Newman; Review memos to/from H. Barkley re continuance	0.20	75.00	CMG
	Review notice of continuance	0.20	75.00	CMG
	ECF filing re report of sale	0.05	9.25	SLP
Feb-19-21	Assist CMG drafting Report of Sale of house	0.10	18.50	KLC
Feb-22-21	Review sale order, dictation of report of sale, review settlement statement, review and revision of report	0.65	243.75	CMG
	Dictation of Report of Sale; Review and revision of same and review Settlement Statement	0.65	243.75	CMG
Mar-02-21	Review status conference notice	0.20	75.00	CMG
Mar-03-21	Receipt and review of Notice of Telephonic Status Conference re Helena's Objections to Plan, Oral Amendment to Plan; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Mar-04-21	Attended status conference	0.20	75.00	CMG

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	Review order to reset	0.20	75.00	CMG
	Review minute entry	0.10	37.50	CMG
	Receipt and review of Order Resetting Hearing re Helena's Objections to Plan; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
Mar-05-21	Review memos to/from Client, KLC re timing of closing sale of 41 acres	0.20	75.00	CMG
Mar-15-21	Telephone conference with Reggie Blackledge re release of 41 acres	0.20	75.00	CMG
Apr-06-21	Telephone conference with Mr. Folkes re trial prep and cash flow exhibit	0.20	75.00	CMG
Apr-07-21	Research re Helena and its parent's finances	1.20	450.00	CMG
	Review memos to/from Carrie Brown, client re specifics of cash flow projections	0.25	93.75	CMG
	Review file and court docket re: 4/8/21 hearing on Ch. 12 Plan; update hearing folder for same	0.20	37.00	KLC
Apr-12-21	Review payment schedule	0.20	75.00	CMG
	Dictation of letter to client re payment schedule	0.20	75.00	CMG
	Assist CMG reviewing/revising itemizations	0.20	37.00	KLC
	Assist CMG drafting letter to John Folkes re Plan payment schedule	0.10	18.50	KLC
Apr-13-21	Dictation of Report of Sale; Review and revision of same	0.25	93.75	CMG
	Assist CMG drafting Report of Sale for 41 acres	0.15	27.75	KLC
Apr-14-21	Review memos to/from Reggie Blackledge re sale of 41 acres and disposition of proceeds	0.20	75.00	CMG
	Assist CMG revising Report of Sale for 41 acres	0.20	37.00	KLC

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Apr-15-21	Review memo from KLC, client re decision to sell acreage	0.15	56.25	CMG
Apr-19-21	Dictation of Motion to Amend Plan	0.75	281.25	CMG
	Assist CMG drafting Motion to Modify Chapter 12 Plan, Notice, Certificate of Service and Order re same	0.30	55.50	KLC
Apr-20-21	Assist CMG revising Motion to Modify Ch. 12 Plan and Order re same	0.30	55.50	KLC
Apr-21-21	Receipt and review of hearing notice re Motion to Modify Plan; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
Apr-29-21	Review memo from Chapter 12 Trustee re MORs delinquency; Conference with KLC re same issue	0.25	93.75	CMG
	Assist CMG drafting letter to John Folkes re delinquent MORs	0.10	18.50	KLC
Apr-30-21	Assist CMG revising letter to John Folkes re delinquent MORs	0.10	18.50	KLC
May-11-21	Review motion to dismiss submitted by Ch. 12 Trustee	0.50	187.50	CMG
	Review notice of hearing	0.20	75.00	CMG
	Conference with KLC re MORs and related matters	0.10	37.50	CMG
	Receipt and review of hearing notice re Trustee's Motion to Dismiss; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
May-14-21	Review objections to motion to modify	0.75	281.25	CMG
May-17-21	Telephone conference with Mr. Folkes re case status and pending motion	0.25	93.75	CMG
May-18-21	Assist CMG drafting and revising Motion to Withdraw Motion to Modify Plan and Order re same	0.30	55.50	KLC
	Assist CMG drafting Motion to Continue	0.20	37.00	KLC

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	Hearing on Trustee's Motion to Dismiss and Order re same			
May-20-21	Receipt and review of hearing notice re Helena's Motion for Relief from Stay; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
May-21-21	Assist CMG revising Motion to Continue Hearing on Trustee's Motion to Dismiss and Agreed Order re same	0.10	18.50	KLC
May-26-21	Telephone conference with Mr. Folkes re Plan provisions	0.20	75.00	CMG
Jun-01-21	Assist CMG revising Motion to Continue 6/17 Hearings and Order re same	0.10	18.50	KLC
Jun-02-21	Review numerous memos to/from Christy Cannette, counsel re resetting motion for relief from stay and motion to dismiss for trial	0.30	112.50	CMG
Jun-03-21	Review memos to/from Christy Cannette re resetting hearings	0.15	56.25	CMG
	Review reset order and notice	0.15	56.25	CMG
Jun-09-21	Review Trustee motion	0.20	75.00	CMG
	Dictation of answer to Trustee motion; Review and revision of same	0.30	112.50	CMG
Jun-10-21	Review motion to lift (Helena)	0.60	225.00	CMG
	Dictation of answer to Helena motion to lift; Review and revision of same	0.55	206.25	CMG
	Telephone conference with Mr. Folkes re MOR status conference	0.20	75.00	CMG
	Review Bank reply	0.20	75.00	CMG
	Receipt and review of Order Resetting Hearing re Trustee's Motion to Dismiss; calendar hearing date to trigger preparation of hearing folder	0.10	18.50	KLC
	Receipt and review of Order Resetting Hearing re Helena's Motion for Relief from Stay;	0.10	18.50	KLC

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	calendar hearing date to trigger preparation of hearing folder			
	Assist CMG drafting Answer, Response to Trustee's Motion to Dismiss	0.10	18.50	KLC
	Assist CMG drafting Answer, Response to Helena's Motion to Lift Stay	0.10	18.50	KLC
Jun-11-21	Conference with client, KLC re covering MORs, terms of plan, status of land sale	0.35	131.25	CMG
	Meeting with John Folkes, Carrie Brown re MORs	0.65	120.25	KLC
Jun-18-21	Review memos to/from KLC re Bank payments as adjusted amounts, correct balance owed and revised new debt installments	0.25	93.75	CMG
Jun-21-21	Review January, February, March and April MORs	0.55	206.25	CMG
	Dictation of letter to Chapter 12 Trustee re MORs	0.20	75.00	CMG
Jun-28-21	Dictation of amended plan	1.00	375.00	CMG
	Review and revision of amended plan	0.40	150.00	CMG
	Assist CMG drafting and revising 1st Amended Plan	0.90	166.50	KLC
Jun-29-21	Review memos to/from Justin Jones re plan and prior orders	0.25	93.75	CMG
Jun-30-21	Receipt and review of Notice and Order Setting Ch. 12 Confirmation Hearing; calendar hearing date and objection deadline to trigger preparation of hearing folder	0.15	27.75	KLC
	Assist CMG drafting Certificate of Service re 1st Amended Ch. 12 Plan, Notice & Order re same	0.10	18.50	KLC
Jul-01-21	Conference with KLC re timing of payments to Peoples Bank	0.20	75.00	CMG
	Review hearing notice	0.20	75.00	CMG
	Dictation of COS re hearing notice for plan	0.15	56.25	CMG

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	Organize and supervise mailout of 1st Amended Ch. 12 Plan and Order & Notice re same	0.20	37.00	KLC
Jul-13-21	Review memo from Trustee, KLC re MOR	0.20	75.00	CMG
	Update/preparation of document management control (subfiles and pleadings)	0.40	74.00	KLC
Jul-14-21	Update/preparation of document management control (subfiles and pleadings)	1.50	277.50	KLC
Jul-19-21	Review Helena objection to plan	0.75	281.25	CMG
Jul-20-21	Review Peoples Bank objection to plan	0.40	150.00	CMG
Jul-22-21	Telephone conference with Mr. Folkes re plan, MORs & trial testimony	0.30	112.50	CMG
	Review MORs; Conference with KLC re MOR mistakes	0.20	75.00	CMG
	Review property description	0.10	37.50	CMG
	Dictation of sale motion	1.00	375.00	CMG
	Assist CMG drafting letter to Trustee sending original 1st pages of May and June 2021 MORs	0.10	18.50	KLC
Jul-23-21	Review and revision of motion to sell	0.20	75.00	CMG
	Assist CMG drafting Motion to Sell 84.5 Acres	0.20	37.00	KLC
Jul-26-21	Telephone conference with Jim Spencer re tax payments, settlement issues on plan	0.25	93.75	CMG
	Conference with client re settlement issues, case status, MOR amendments and related issues	0.45	168.75	CMG
	Conference with Walter Newman re case/settlement status	0.10	37.50	CMG
	Telephone conference with Jim Spencer re settlement issues and terms	0.30	112.50	CMG

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	Telephone conference with client re Helena settlement	0.20	75.00	CMG
	Review file and prepare for hearing	1.25	468.75	CMG
	Travel to Gulfport	1.60	600.00	CMG
	Review notice of status conference	0.20	75.00	CMG
	Review memos to/from Justin Jones re settlement with Helena	0.20	75.00	CMG
	Review June 2021 MOR	0.30	112.50	CMG
	Dictation of letter Chapter 12 Trustee re June 2021 MOR	0.20	75.00	CMG
	Review file and court docket re: 7/27/21 hearing on Trustee's Motion to Dismiss; prepare hearing folder for same	0.25	46.25	KLC
	Review file and court docket re: 7/27/21 hearing on Helena's Motion for Relief from Stay; prepare hearing folder for same	0.20	37.00	KLC
	Review file and court docket re: 7/27/21 hearing on 1st Amended Ch. 12 Plan; prepare hearing folder for same	0.50	92.50	KLC
	Meeting with John Folkes and Carrie Brown re MORs	0.25	46.25	KLC
Jul-27-21	Conference with counsel re pre- and post-confirmation issues	0.50	187.50	CMG
	Attended hearing	0.50	187.50	CMG
	Travel to Ridgeland	1.60	600.00	CMG
	Review exhibit list	0.15	56.25	CMG
Jul-28-21	Review various minute entries re results of hearing and directions for preparation and entry of orders	0.25	93.75	CMG
	Review memos to/from Jim Spencer; Review Helena order and approve same	0.35	131.25	CMG

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Aug-06-21	Receipt and review of Agreed Order on Helena's Motion to Terminate Stay; calendar deadlines and reminders to pay ad valorem taxes	0.15	27.75	KLC
	Assist CMG reviewing and revising itemizations	0.60	111.00	KLC
Aug-08-21	Review and revision of itemizations	0.85	318.75	CMG
	Dictation of first application for compensation	0.55	206.25	CMG
	Dictation of notice	0.20	75.00	CMG
	Dictation COS re fee application	0.15	56.25	CMG
Aug-09-21	Review and revision of itemizations	0.20	75.00	CMG
	Assist CMG reviewing and revising itemizations	0.20	37.00	KLC
	Assist CMG drafting and revising CMG's 1st Fee Application, Notice, Certificate of Service and Order re same	0.45	83.25	KLC
	Totals	109.50	\$35,229.50	

DISBURSEMENTS

Feb-03-20	Photocopies 36 pages @ .25/page	9.00
	Postage Mailout 4 @ .50	2.00
Feb-18-20	COURTS/USBC-MS-S	275.00
Mar-04-20	Photocopies 27 pages @ .25/page	6.75
Mar-20-20	COURTS/USBC-MS-S	31.00
May-05-20	Long distance	1.13
May-29-20	Photocopies 66 pages @ .25/page	16.50
	Postage Mailout 5 @ .65	3.25
Jul-21-20	Pacer 5/1/20-7-10-20	0.20
Aug-17-20	Photocopies 7 pages @ .25/page	1.75
	Postage to Trustee	0.65
Sep-18-20	Photocopies 33 @ \$.25 per copy	8.25
Sep-25-20	Long Distance \$3.00	0.00
Oct-05-20	Postage 14 @ \$0.65 mailout	9.10
Oct-22-20	Long Distance \$3.13	3.13
Oct-29-20	Postage 6 @ \$.50 mailout	3.00
	Photocopies 47 @.25/page	11.75
	Photocopies 28 @ \$.25 mailout	7.00

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Nov-15-20	Long Distance \$2.13	2.13
Nov-19-20	COURTS/USBC-MS-S	181.00
Dec-29-20	Photocopies 116 @ \$.25	29.00
	Postage 18 @ \$.50 mailout	9.00
Dec-31-20	COURTS/USBC-MS-S	188.00
Jan-04-21	Postage 1 @ \$.50	0.50
Jan-07-21	Photocopies 3 @ \$.25	0.75
Jan-19-21	Long Distance	2.00
Jan-26-21	Long Distance	2.00
Jan-29-21	Long Distance	3.00
Feb-02-21	Postage 1 @ \$.51 re Trustee	0.51
Feb-04-21	Long Distance	2.00
	Parking	7.50
Feb-18-21	Long distance	2.13
Mar-15-21	Long Distance	2.00
Apr-06-21	Long Distance	2.00
Apr-19-21	Meal 4/8/21	3.29
Jun-21-21	Postage 1 @ \$.51 re Trustee	0.51
Jul-01-21	Photocopies 90 @ \$.25 re mailout	22.50
	Postage 13 @ \$.71 re mailout	9.23
Jul-26-21	Long Distance	2.00
	Mileage 368 miles @ .58/mile	213.44
	Lodging	284.48

Totals	\$1,358.43
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Total Fee & Disbursements	\$36,587.93
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Balance Now Due	\$36,587.93
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SUMMARY BY TIMEKEEPER

TIMEKEEPER	RATE	HOURS	AMOUNT
Craig M. Geno	\$375.00	78.80	\$29,550.00
Kathryn L. Carter	\$185.00	28.35	\$5,244.75
Sherry Lynn Purvis	\$185.00	2.35	\$434.75

TAX ID Number 80-0084265